

The Honorable Robert J. Bryan

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7                   **UNITED STATES DISTRICT COURT**  
8                   **WESTERN DISTRICT OF WASHINGTON**  
9                   **AT TACOMA**

10 STATE OF WASHINGTON,

11                   Plaintiff,

12                   v.

13 THE GEO GROUP, INC.,

14                   Defendant.

15 Case No. 3:17-cv-05806-RJB

16                   **DECLARATION OF COLIN L. BARNACLE**  
17                   **IN SUPPORT OF DEFENDANT THE GEO**  
18                   **GROUP, INC.'S OPPOSITION TO**  
19                   **PLAINTIFF STATE OF WASHINGTON'S**  
20                   **MOTIONS IN LIMINE**

21         I, Colin L. Barnacle, make the following statement under oath subject to the penalty of  
22 perjury pursuant to the laws of the United States and the State of Washington:

23         1.         I am the attorney for The GEO Group, Inc. in the above-captioned matter. I am  
24 over the age of eighteen (18), and I am competent to testify in this matter.

25         2.         Attached are true and correct copies of the following exhibits:

26                   **EXHIBIT A:** Attached as Exhibit A is the Complaint for Declaratory Judgment and  
27 Injunctive Relief filed in *United States of America v. Gavin Newsom, et al.*, S.D. Cal. Case No.  
3:20-cv-00154-MMM-AHG.

28                   **EXHIBIT B:** Attached as Exhibit B is the enacting legislation of the Washington  
29 Minimum Wage Act from 1961, Chapter 18, which was introduced by Senate Bill 30.

30                   **EXHIBIT C:** Attached as Exhibit C is the enacting legislation of the Washington  
31 Minimum Wage Act from 1975, Chapter 289, which was introduced by Substitute House Bill 32.

1           **EXHIBIT D:** Attached as Exhibit D are emails between Sandy Mullins, Tammy Fellin,  
2 Suchi Sharma, Lynne Buchannan, Elizabeth Smith and other individuals from Washington's  
3 Department of Labor & Industries.

4           **EXHIBIT E:** Attached as Exhibit E are excerpts to the 30(b)(6) deposition of Joshua  
5 Grice taken December 6, 2019.

6           **EXHIBIT F:** Attached as Exhibit F are excerpts to the 30(b)(6) deposition of Joshua  
7 Grice taken September 5, 2019.

8           **EXHIBIT G:** Attached as Exhibit G are excerpts to the 30(b)(6) deposition of Colleen  
9 Melody taken August 10, 2018.

10          **EXHIBIT H:** Attached as Exhibit H is a letter from Shannon Armstrong dated April 15,  
11 2019.

12          **EXHIBIT I:** Attached as Exhibit I are excerpts from the 30(b)(6) deposition of Chuck  
13 Hill taken July 10, 2019.

14          **EXHIBIT J:** Attached as Exhibit J is Exhibit 22 to the deposition of Fernando Aguirre-  
15 Urbina taken June 11, 2018.

16          Dated this 23rd day of March, 2020 at Denver, Colorado.

17          Akerman, LLP

18          s/ Colin L. Barnacle

19          Colin L. Barnacle, (Admitted *pro hac vice*)  
Attorney for Defendant The GEO Group, Inc.

1                   **PROOF OF SERVICE**

2       I hereby certify on the 23rd day of March 2020, pursuant to Federal Rule of Civil Procedure  
3 5(b), I electronically filed and served the foregoing **DECLARATION OF COLIN L.**  
4 **BARNACLE IN SUPPORT OF DEFENDANT THE GEO GROUP, INC.'S OPPOSITION**  
5 **TO PLAINTIFF STATE OF WASHINGTON'S MOTIONS IN LIMINE** via the Court's  
6 CM/ECF system on the following:

7       Marsha J. Chien  
8       Andrea Brenneke  
9       Lane Polozola  
10      Patricio A. Marquez  
11      OFFICE OF THE ATTORNEY GENERAL  
12      800 Fifth Avenue, Suite 2000  
13      Seattle, Washington 98104

14     *Attorneys for Plaintiff*

15                   \_\_\_\_\_  
16                   s/ Nick Mangels  
17                   Nick Mangels